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 Pharmacy, LLC d/b/a Myers Drug and  
 Micah and Krystan Pratt*

**IN THE UNITED STATES BANKRUPTCY COURT  
 FOR THE NORTHERN DISTRICT OF TEXAS  
 LUBBOCK DIVISION**

<b>IN RE:</b>	§	
	§	
<b>MP SOUTHPARK PHARMACY, LLC d/b/a MYERS DRUG</b>	§	<b>Case No. 24-50146-RLJ-11</b>
	§	
<b>Debtor.</b>	§	
	§	
<b>IN RE:</b>	§	
	§	
<b>MICAH G. PRATT and wife, KRYSTAN L. PRATT</b>	§	<b>Case No. 24-50147-RLJ-11</b>
	§	
<b>Debtors.</b>	§	

**DEBTORS' MOTION FOR JOINT ADMINISTRATION**

TO THE HONORABLE ROBERT L. JONES, U.S. Bankruptcy Judge:

NOW COMES, MICAH G. PRATT and wife, KRYSTAN L. PRATT (the “Debtors”) the Debtors in the above-referenced bankruptcy proceeding, and files this their Motion For Joint Administration of its Chapter 11 bankruptcy case with that of the Chapter 11 proceeding of their affiliate, MP SOUTHPARK PHARMACY, LLC d/b/a MYERS DRUG, (Case No. 24-50146-RLJ-11), and in support of such Motion would respectfully show the Court as follows:

**I.**

Pursuant to 11 U.S.C. § 302 and Bankruptcy Rule 1015 the Debtor wishes to jointly administer its case with that of MP SOUTHPARK PHARMACY, LLC d/b/a MYERS DRUG, (Case No. 24-50146-RLJ-11). This request for consolidation is to allow for a joint administration of the two cases. The Debtors would submit that this Motion is filed in good faith and is in the best interest of all of the parties.

**II.**

The Debtors, MICAH G. PRATT and wife, KRYSTAN L. PRATT would show that MP SOUTHPARK PHARMACY, LLC d/b/a MYERS DRUG, (Case No. 24-50146-RLJ-11) is an affiliate of the Debtors. The Debtors would submit that Bankruptcy Rule 1015 allows for the joint administration of these estates. The Debtors would further show that the majority of the creditors are the same in both cases and there is little or no potential for a conflict of interest.

**III.**

The Debtors submit that granting their Motion For Joint Administration of its case with that of MP SOUTHPARK PHARMACY, LLC d/b/a MYERS DRUG for joint administration would be more convenient for all parties in interest and creditors of the two estates. The Debtors would like to propose a joint Subchapter V Plan of Reorganization to the creditors of the two estates.

WHEREFORE, PREMISES CONSIDERED, MICAH G. PRATT and wife, KRYSTAN L. PRATT pray for an Order of the Court Approving their Motion For Joint Administration of their case with that of MP SOUTHPARK PHARMACY, LLC d/b/a MYERS DRUG, and asks for such other relief at law or equity to which it may show itself

justly entitled.

Respectfully Submitted,

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/s/ David R. Langston

David R. Langston, SBN: 11923800

***Attorneys for Debtors, MP Southpark  
Pharmacy, LLC d/b/a Myers Drug and  
Micah and Krystan Pratt***

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### **CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the foregoing Motion was served via e-mail on this the 25<sup>th</sup> day of June, 2024 to the following listed parties in interest:

1. MP Southpark Pharmacy  
Attn: Micah Pratt  
1506 A. South Sunset  
Littlefield, TX 79339  
***Debtor***
2. Micah & Krystan Pratt  
203 East 26<sup>th</sup> St.  
Littlefield, Texas 79339
3. U.S. Trustee's Office  
1100 Commerce St., Room 9C60  
Dallas, Texas 75242
4. All parties receiving ECF Notice in this case.

/s/ David R. Langston

David R. Langston